



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

December 14, 1992

REPLY TO
ATTN OF: HW-114

MEMORANDUM

SUBJECT: Preliminary HRS Score
J.H. Baxter & Company-Arlington (WAD053823019)

FROM: Monica Rolluda *Monica Rolluda*
Site Assessment

TO: Debbie Flood
Site Assessment Team Leader

A review of file documents relevant to the J.H. Baxter-Arlington site has been conducted for the purpose of generating a preliminary HRS score. A preliminary HRS score of 0.66 was calculated based on potential to release to groundwater. The contaminant of concern is pentachlorophenol. A spill of nearly 1,400 gallons PCP was known to have occurred on site in 1981. Also, it was alleged that in the 1960's, PCP was landfilled on site in a 20' x 20' area.

The surface water pathway was not evaluated as off-site surface water migration is unlikely to occur. Numerous roads between the site and Portage Creek as well as the "french" drain systems on site make surface water contamination unlikely. The air and soil exposure pathways were not considered as evaluation of these pathways would not significantly affect the site score.

The low score is primarily due to a small hazardous waste quantity and the lack of pathway targets. The following considerations and assumptions were made in scoring this site:

- There is no documented observed release to groundwater, surface water, air or soil.
- The aquifer of concern is located approximately 20 feet below ground surface and is used for drinking water.
- A default value of 10 was used for HWQFV as opposed to the value of 1.

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- It was assumed that the well nearest to (.2 mi) and downgradient of the site serves nearly 230 people; drinking water target population per distance rings were conservatively assumed at: 1/4 to 1/2 mi 250 people; 1/2 to 1 mi 320 people; 1 to 2 mi 2,000 people; 2 to 3 mi 2,300 people; 3 to 4 mi 3,000 people. This is a conservative estimate as majority of the drinking water population is serviced by the City of Arlington.

It should be noted that the contaminated soil resulting from the 1981 PCP spill has been removed and disposed of by J.H. Baxter. A total of 105,600 lbs of contaminated soil was sent to Arlington, Oregon for proper disposal. The suspected 20'x20' contaminated area was excavated in 1982 and all contaminated material was removed and transported for proper disposal to Arlington, Oregon. The excavated area was filled in and is felt to no longer present any problem to the environment (RCRA document).

Based on my December 9 phone conversation with Gail Colburn of DOE, the primary pathway target of concern is the trailer park drinking water population located downgradient of the site. Per Ms. Colburn the PCP groundwater plume has not yet reached the well, however, the possibility of it doing so is a concern. Efforts have been made by local authorities to negotiate an Agreement between trailer park representatives and the J.H. Baxter Company. The Agreement would allow for the trailer park to hook up their drinking water system to the City's system. To date, the recommended hook-up has not been conducted as negotiations are still on-going. Certain conditions/terms to the agreement brought forth by trailer park representatives warrant further discussion. Ms. Colburn also mentioned that during her March 15, 1992 walk-thru of the facility, it was evident that facility operations have improved and the site is relatively "clean."

In view of the above information and the low HRS score, no further action by the Superfund Program is recommended at this site. However, it is recommended that local authorities continue to pursue/facilitate negotiations between trailer park representatives and J.H. Baxter. Should an agreement fail to be reached within a reasonable amount of time, it is recommended that local authorities sample the trailer park drinking water well to confirm the non-migration/migration of contaminants and take necessary action as warranted.

Reference: CERCLA and RCRA file documents.

PREScore printout attached